

WHEELABRATOR

1/14/02

Mr. Andrew Stephens
Trade Policy Staff Committee
Office of the USTR
600 17th Street N.W.
Washington, D.C. 20508

1606 Executive Drive
LaGrange, GA 30240
706-884-6884 • 800-544-4144 • Fax: 706-845-0792
e-mail: wheelabrator@usfspg.com
www.surfacepreparation.com

Re: Investigation No. 201-TA-73 (Docket # X-032)

Dear Mr. Stephens,

On behalf of the USF Surface Preparation Group, Wheelabrator Division, I write to support Lyman Steel's request to exclude imports of its manganese steel plate, manganese bars, and manganese sheet in the above-referenced safeguards investigation.

Wheelabrator is an Original Equipment Manufacturer of shot-blast equipment and spare parts. We compete globally with shot-blast equipment producers around the world. 13% manganese steel is used to construct the outer shell and linings of the machines. It is the only known material that can meet the demands of the shot-blasting industry. I personally have contacted every business advertising, in the Thomas Registers, as being a supplier of manganese steel. They all import the steel, as there are no U.S. producers.

The price of 13% manganese steel affects the bottom line at our company more than any other material that goes into the manufacture of our machines. Even if duties are imposed on imports of 13% manganese steel, we will still have to purchase the imported product. However, the increase in duties will certainly serve to injure our Company, putting us at a competitive disadvantage, as we must compete in a global market where our international competitors are not subject to the same increase in raw material cost.

Respectfully submitted,



Gregory Z. Brand
Purchasing Manager
Wheelabrator

BCP WHEELABRATOR

January 14th, 2002

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600 17th Street, N.W.
Washington, D.C. 20508

1219 Corporate Drive
Burlington, ON L7L 5V5
Telephone: 905-319-7930 • Toll Free: 800-845-8508
Sales Fax: 800-571-5637 • Main Fax: 800-571-9889
www.surfacepreparation.com

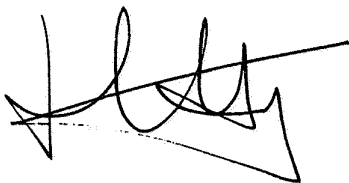
RE: Investigation No. 201-TA-73 (Docket # X-032)

Dear Mr. Stephens:

On behalf of USF Surface Preparation Group, we write to support Lyman Steel's request to exclude imports of its manganese steel plate, manganese bars and manganese sheet in the above-referenced safeguards investigation.

USF is an OEM (Original Equipment Manufacturer), which produces shot-blast equipment. We compete globally with shot-blast equipment producers around the world. 13% manganese steel is used to construct the outer shell of the blast machine. The price of 13% manganese steel affects the bottom line at our company more than any other factor, except salary and overhead. 13% manganese steel is the only steel that we can use to produce shot-blast equipment. We cannot source 13% manganese steel from a domestic supplier, as there are no U.S. producers of 13% manganese steel. If duties are imposed on imports of 13% manganese steel, we will still have to purchase imported products. However, the increase in duties will simply serve to injure our company, as we must compete in a global market where our international competitors are not subject to the same unfair increase in raw material costs. If duties are imposed against 13% manganese steel, it will be extremely difficult for us to compete against foreign producers of shot-blast equipment. In short, it could be devastating to our business if the U.S. government imposes duties on 13% manganese steel.

Respectfully submitted,



Lindsey Spratley
USF Surface Preparation Group/BCP Products

USF SURFACE PREPARATION
GROUP